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AGAPE BROADCASTERS INC vs. AMERICAN NATIONAL PROPERTY AND CASUALTY COMPANY

8/26/2024

Cause: 202447287 CDI: 7 Court: 125

DOCUMENTS

Number	Document	Post Jdgm	Date	Pgs	
115735391	Civil Process Request Form	08/	05/2024	3	
115592191	Plaintiffs Original Petition For Declaratory Judgment For The Enforcement Of A Judgment For Insurance Code Violations	07/	/26/2024	10	
-> 115595620	Affidavit In Support Of Filing Of Foreign Judgment	07/	/26/2024	2	
·> 115595621	Exhibit A Judgment	07/	/26/2024	1	



CT Corporation Service of Process Notification

08/12/2024

CT Log Number 547077806

Service of Process Transmittal Summary

TO: Stuart Paulson, Senior Vice President

American National Property and Casualty Company

1949 E Sunshine Corporate Centre Springfield, MO 65899-0001

RE: Process Served in Texas

FOR: American National Property and Casualty Company (Domestic State: MO)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: AGAPE BROADCASTERS, INC. vs. AMERICAN NATIONAL PROPERTY AND CASUALTY

COMPANY

CASE #: 202447287

NATURE OF ACTION: Insurance Litigation

PROCESS SERVED ON: C T Corporation System, Dallas, TX

DATE/METHOD OF SERVICE: By Traceable Mail on 08/12/2024

JURISDICTION SERVED: Texas

ACTION ITEMS: CT will retain the current log

Image SOP

Email Notification, Service Of Process pcserviceofprocess@americannational.com

Email Notification, Emily Novicky emily.novicky@americannational.com

REGISTERED AGENT CONTACT: C T Corporation System

1999 Bryan Street Suite 900 Dallas, TX 75201

866-401-8252

Large Corporation Team@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



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Receipt Number: 1039141

Tracking Number: 74357101

COPY OF PLEADING PROVIDED BY PLT

CAUSE NUMBER: 202447287

PLAINTIFF: AGAPE BROADCASTERS INC In the 125th Judicial

vs. District Court of

DEFENDANT: AMERICAN NATIONAL PROPERTY AND Harris County, Texas

CASUALTY COMPANY

EML

CITATION

THE STATE OF TEXAS County of Harris

TO: AMERICAN NATIONAL PROPERTY AND CASUALTY COMPANY BY SERVING ITS REGISTERED AGENT C

T CORPORATION SYSTEM

1999 BRYAN STREET SUITE 900

DALLAS TX 75201

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION FOR DECLARATORY JUDGMENT FOR THE ENFORCEMENT OF A JUDGMENT FOR INSURANCE CODE VIOLATIONS AND NOTICE OF FILING FOREIGN JUDGMENT AGAINST TEXAS ESTATE.

This instrument was filed on July 26, 2024, in the above numbered and styled cause on the docket in the above Judicial District Court of Harris County, Texas, in the courthouse in the City of Houston, Texas. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

ISSUED AND GIVEN UNDER MY HAND and seal of said Court, at Houston, Texas, this August 5, 2024.



Marilyn Burgess

Marilyn Burgess, District Clerk Harris County, Texas 201 Caroline, Houston, Texas 77002

Generated By: WANDA CHAMBERS

Issued at request of: PECKHAM, CHARLES HENRY 800 BERING DR #220 HOUSTON, TX 77057 713-574-9044

Bar Number: 15704900

Tracking Number: 74357101

CAUSE NUMBER: 202447287

PLAINTIFF: AGAPE BROADCASTERS INC	In the 125th
vs.	Judicial District Court
DEFENDANT: AMERICAN NATIONAL PROPERTY AND	of Harris County, Texas
CASUALTY COMPANY	

OFFICER/AUTHORIZED PERSON RETURN _____o'clock ____. M., on Came to hand at the _____ day _____, 20___ Executed at (address) _ ____ County ____o'clock ____. M., on the day of by delivering to _____ _____ defendant, in person, a true copy of this Citation together with the accompanying _____ copy(ies) of ____ Petition attached thereto and I endorsed on said copy of the Citation the date of delivery. To certify which I affix my hand officially this _____ day of __, 20 _____. Affiant Deputy On this day, ____, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return. SUBSCRIBED SWORN TO AND BEFORE ME on this _____ _____, 20 _____

7/26/2024 1:03 PM Marilyn Burgess - District Clerk Harris County Envelope No. 90234226 By: Tianni Williams Filed: 7/26/2024 1:03 PM

Cause No		
AGAPE BROADCASTERS, INC. Plaintiff,	\$ \$ \$	IN THE DISTRICT COURT OF
v. AMERICAN NATIONAL PROPERTY	,	HARRIS COUNTY, TEXAS
AND CASUALTY COMPANY and the ESTATE OF MARCUS TODD SAMPSON, Defendants.	& & & &	JUDICIAL DISTRICT

Cauce No.

PLAINTIFF'S ORIGINAL PETITION

For

DECLARATORY JUDGMENT, FOR THE ENFORCMENT OF A JUDGMENT, FOR INSURANCE CODE VIOLATIONS

And

NOTICE OF FILING FOREIGN JUDGMENT AGAINST TEXAS ESTATE

NOW INTO COURT, through undersigned counsel, comes Plaintiff, AGAPE BROADCASTERS, INC., which does allege, aver, and represent as follows:

I.

PARTIES

Plaintiff is a corporation organized and existing under the laws of the State of Louisiana, with its principal place of business located at 110 West Third Street, Crowley, Louisiana 70526.

Defendant, American National Property and Casualty Company ("ANPAC") is a foreign, for-profit Fire and Casualty insurance company which is engaged in the business of

insurance in the State of Texas. ANPAC may be served with process by serving its registered agent, CT Corporation System at 1999 Bryan Street, Suite 900, Dallas, Texas 75201, its registered address. Service of said Defendant may be affected by personal delivery or certified mail

Defendant, **Estate of Marcus Todd Sampson** is an estate in Harris County Probate Court No. 4 under Cause No. 472093, *In the Estate of Marcus Todd Sampson, Deceased*, which may be served with process by serving Vallie Matix, Administratrix of the Estate, by serving Lewis and Lewis Attorneys at Law, PLLC, attorneys for the estate and/or attorneys for the administratrix, at 16055 Space Center Blvd., Suite 190, Houston, Texas 77602. Service of said Defendant may be affected by personal delivery or certified mail.

H.

DISCOVERY CONTROL PLAN

Discovery is intended to be conducted under Level 2 as per Rule 190.3 of the Texas Rules of Civil Procedure.

III.

JURISDICTION AND VENUE

Venue is proper pursuant to Section 15.035 of the Texas Civil Practice and Remedies Code due to debt obligations in this state and county, and Section 15.002(a)(1) and (2) of the Texas Civil Practice and Remedies Code. Furthermore, subject matter jurisdiction is present. The amount in controversy is within the jurisdictional limits of this Court. Pursuant to Rule 47, the amount sought in this case is more than \$1 million.

This court has jurisdiction over Defendant ANPAC because said Defendant purposefully availed itself of the privilege of conducting activities in the State of Texas and established minimum contacts sufficient to confer jurisdiction over said Defendant, and the assumption of

jurisdiction over ANPAC will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

Plaintiff would show that Defendant ANPAC had continuous and systematic contacts with the State of Texas sufficient to establish general jurisdiction over said Defendant.

Furthermore, Plaintiff would show that Defendant ANPAC engaged in activities constituting business in the State of Texas as provided by Tex. Civ. Prac. & Rem. Code § 17.042, in that said Defendant contracted with a Texas resident and performance of the agreement in whole or in part thereof was to occur in Texas.

IV.

THE INCIDENT AND ITS CONSEQUENCES

Plaintiff owns and operates KAJN Radio (hereinafter "KAJN"), a Christian radio station broadcasting on air across Southwest Louisiana and East Texas since 1977. KAJN is one of the leading Christian radio stations in the United States, broadcasting only Christian music and programming, including teaching programs. KAJN's Christian message reaches approximately one and a half million people in the Lake Charles, Alexandria, Lafayette, and Baton Rouge areas, as well as listeners in East Texas and on oil rigs in the Gulf of Mexico.

KAJN is broadcast on a commercial frequency, 102.9 FM, pursuant to a license granted by the Federal Communications Commission (FCC). KAJN, as an FCC licensee, is a commercial, for-profit station entitled to transfer its license by private sale to another entity which may commercially operate the frequency.

KAJN's signal originates at its studio in Crowley, Louisiana. At the time of the events described herein, KAJN sent its signal from its Crowley studio to its microwave dish connected to the TV 3 Tall Tower in Kaplan, Louisiana. The signal then moved from KAJN's dish to the tower's transmitter building. The transmitter processed the signal and moved it back up the tower

through KAJN's transmission line to KAJN's antenna, where the signal was broadcast to listeners. Including KAJN's antenna, the TV 3 Tall Tower in Kaplan was nearly 1,800 feet high and had a radio broadcast capability of 100,000 watts.

At approximately 7:56 a.m. on August 31, 2018, just a few minutes after taking off from the Chris Crusta Memorial Airport in Abbeville, Louisiana, a fixed wing single engine aircraft Model PA-28R, manufactured by Piper Aircraft, Inc., bearing FAA registration number N7430J, crashed into the TV 3 Tall Tower in Kaplan. The aircraft's operator, Marcus Todd Sampson, as well as his young daughter, a passenger in the plane, were killed instantly.

As a result of the crash, the TV 3 Tall Tower and all of KAJN's associated equipment, including its microwave dish, transmission line, and antenna, were completely destroyed.

After scrambling for eleven hours to identify alternative methods by which to broadcast its signal to listeners, KAJN secured use of another station's back-up antenna at a height of 500 feet. The back-up antenna and alternative tower allowed KAJN to broadcast its signal at just 2,000-3,000 watts, or 2%-3% of its pre-crash capability. KAJN's broadcast area, once reaching nearly a million and a half people between Lake Charles, Alexandria, Lafayette, Baton Rouge, and elsewhere was reduced to just the Crowley, Jennings, Eunice, and Opelousas areas, with limited coverage in the key Lafayette area.

Over the next several months, KAJN attempted to develop a long-term solution to the problem of achieving its pre-crash broadcast capabilities without use of the now-destroyed TV 3 Tall Tower in Kaplan. In May of 2019, KAJN completed negotiations of a deal with KATC TV Channel 3, based in Lafayette, Louisiana, to use its tower located in Branch, Louisiana to broadcast its signal. Although the Branch tower is 1,800 feet high, the deal with KATC TV Channel 3 allows KAJN to broadcast with an antenna at 800 feet at an output of only 11,000-12,000 watts, achieving only 11%-12% of KAJN's pre-crash capability.

Moreover, the Branch tower on which KAJN now is broadcasting is located outside of KAJN's broadcast zone as approved by the FCC. Although KAJN has obtained the FCC's permission to broadcast outside its broadcast zone with an antenna at 800 feet at an output of only 11,000-12,000 watts, KAJN must secure additional, formal approval by the FCC in order to broadcast with an antenna at a higher level and at a full licensed output power of 100,000 watts.

Between March 18, 2018 and March 17, 2019, ANPAC insured Macken Aviation, LLC and its individual executive officers and members, in consideration for premiums duly paid, under aircraft insurance policy number AC-03390-00 (the "Policy"). The Policy afforded coverage against certain claims, lawsuits, and liabilities which may be incurred to third parties within the policy terms, such as the incident outlined above.

The Policy affords coverage under the plain language of the contract to protected persons for their legal liabilities for property damage and bodily injuries to third parties as a result of an occurrence, that is, a sudden event which causes such damage On or about August 31, 2018, while the Policy was in full force and effect, Marcus Todd Sampson was the pilot of an insured aircraft under the Policy when it crashed into Plaintiff Clark's property in Vermillion Parish, Louisiana, causing property damage. The crash resulted in the death of Sampson.

A lawsuit ensued. This matter was adjudicated in the United States District Court, Western District of Louisiana, Lafayette Divion under Civil Action No. 6:19-cv-01099; Agape Broadcasters, Inc. v. Estate of Marcus T. Samson, et al. In that Cause, judgment was rendered in favor of Plaintiff Agape Broadcasters, Inc. against Vallie Matix as the appointed administratrix of the Estate of Marcus Todd Sampson, Defendant in the sum total of \$6,023,642.00 plus legal interest and costs, on August 15, 2023.

V.

NOTICE TO THE ESTATE OF MARCUS TODD SAMPSON

TO: The Estate of Marcus Todd Sampson Vallie Matix, Administratrix of the Estate Lewis and Lewis Attorneys at Law, PLLC, 16055 Space Center Blvd., Suite 190 Houston, Texas 77602

You are hereby notified that the judgment creditor named below has filed an authenticated copy of a judgment with the above-described court. The judgment names you as the judgment debtor and was rendered by the United States District Court for the Western District of Louisiana, Lafayette Division on April 15, 2023. The filing was made under the provisions of the Uniform Enforcement of Foreign Judgments Act as adopted in the State of Texas.

The name and address of the judgment creditor is:

AGAPE BROADCASTERS, INC.

c/o, Charles H. Peckham

TBN: 15704900

Mary A. Martin

TBN: 00797280

Peckham Martin, PLLC

800 Bering Drive, Suite 220

Houston, Texas 77057

TEL: (713) 574-9044

The name and address of the judgment creditor's attorney in Texas is:

Charles H. Peckham

TBN: 15704900

Mary A. Martin

TBN: 00797280

Peckham Martin, PLLC

800 Bering Drive, Suite 220

Houston, Texas 77057

TEL: (713) 574-9044

Given this 26th day of July 2024.

VI.

CLAIMS

Plaintiff, AGAPE BROADCASTERS, INC., as owner and operator of KAJN Radio, brings claims against Defendants, MACKEM AVIATION, LLC (d/b/a/ Space City Aviators) and DAVID L. NORMAN, pursuant to the laws of the State of Louisiana and the State of Texas.

Claim for Enforcement of Judgment

Plaintiff files this claim to enforce the referenced judgment against the Estate and any insurance coverage applicable.

Claim for Declaratory Judgment

Plaintiff files this claim to seek a declaration that the above referenced Policy affords coverage to Marcus Todd Sampson and as a result to the Estate of Marcus Todd Sampson as to the judgment here referenced.

Claim for Insurance Code Violations

Furthermore, the facts giving rise to Plaintiff's claims in this case are not just the incident itself, but rather the Defendant's actions and violations of the Texas Insurance Code, including these specific violations:

- a) Defendants are required by the Tex. Ins. Code §541.060 (a)(2) "to attempt in good faith to effectuate a prompt, fair, and equitable settlement of a claim with respect to which the insurer's liability has become reasonably clear."; and
- b.) The liability of Defendant ANPAC under the Policy is reasonably clear given the facts in this case. What is also clear is that the final decision of denial made by Defendant ANPAC was not a good faith attempt to effectuate a prompt, fair and equitable settlement of Plaintiff's claims of damage Plaintiff is entitled to recover from Defendant.

The Defendants knowingly co	ommitted the	foregoing	violations.	The	foregoing	violations
were a producing cause of Plaintiff's	damages					

VII.

DAMAGES

Damages include the judgment and attorney's fees in filing and prosecuting this matter.

VIII.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

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WHEREFORE, Plaintiff, AGAPE BROADCASTERS, INC., prays that Defendants be cited to appear and answer herein and, following a trial hereof, that Plaintiff be awarded damages, pre-judgment and post-judgment interest in the maximum amount allowed by law, costs of court, and such other relief to which Plaintiff may show itself justly entitled.

Respectfully submitted,

/s/ Charles H. Peckham

Charles H. Peckham TBN: 15704900 cpeckham@pmlaw-us.com

Mary A. Martin TBN: 00797280 mmartin@pmlaw-us.com

PECKHAM MARTIN, PLLC Two Bering Park 800 Bering Drive, Suite 220 Houston, Texas 77057 (713) 574-9044

LUNDY LLP

T. Houston Middleton, IV TBN: 24085753 501 Broad Street (70601) P.O. Box 3010 Lake Charles, Louisiana 70602 Telephone: (337) 439-0707 Facsimile: (337) 439-1029

Counsel for Plaintiff, Agape Broadcasters, Inc.

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Charles Peckham on behalf of Charles Peckham

Bar No. 15704900

cpeckham@pmlaw-us.com Envelope ID: 90234226

Filing Code Description: Petition

Filing Description: Petition

Status as of 7/26/2024 1:43 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Houston Middleton		hmiddleton@lundylawllp.com	7/26/2024 1:03:07 PM	SENT
Hunter Lundy		hlundy@lundylawllp.com	7/26/2024 1:03:07 PM	SENT
Mary A.Martin		mmartin@pmlaw-us.com	7/26/2024 1:03:07 PM	SENT
Drew Lewis	24133131	dlewis@lewis-lawyers.com	7/26/2024 1:03:07 PM	SENT
Polly Lewis	12302250	plewis@lewis-lawyers.com	7/26/2024 1:03:07 PM	SENT
Andrew Lewis	24068006	alewis@lewis-lawyers.com	7/26/2024 1:03:07 PM	ERROR

	Cause No	·	
AGAPE BROADCASTER Plaintiff,	.S, INC.	\$ \$ \$	IN THE DISTRICT COURT OF
		\$ \$ \$	HARRIS COUNTY, TEXAS
AMERICAN NATIONAND CASUALTY COLESTATE OF MASAMPSON,		U	
Defendants.		§	JUDICIAL DISTRICT
		ies Cod	OF FOREIGN JUDGMENT de §35.004(a) - Uniform Enforcement of ats Act
FOR:			
	UNITED STATES WESTERN DISTIC LAFAYETT	CT OF	LOUISIANA
AGAPE BROADCASTERS,	, INC. § §		
VS.	§	Ca	ase No. 6:19-cv-1099 LEAD
SAMPSON, et.al.	§		
STATE OF TEXAS	§		
COUNTY OF HARRIS	§ §		

BEFORE ME, the undersigned authority, on this day personally appeared CHARLES H. PECKHAM, known to me to be a credible person competent in all respects to make this affidavit, and who, being by me sworn upon oath, stated:

"I am the local Texas attorney for the judgment creditor having a judgment dated August 15, 2023 from the United States District Court for the Western District of Louisiana, Lafayette Division. An authenticated copy of the judgment has this day been filed with the clerk of the above-captioned court attached as

Exhibit A hereto.

"The name and last known address of the judgment debtor is:

The Estate of Marcus Todd Sampson Vallie Matix, Administratrix of the Estate Lewis and Lewis Attorneys at Law, PLLC, 16055 Space Center Blvd., Suite 190 Houston, Texas 77602

"The name and address of the judgment creditor is:

AGAPE BROADCASTERS, INC.

c/o, Charles H. Peckham

TBN: 15704900 Mary A. Martin TBN: 00797280

Peckham Martin, PLLC 800 Bering Drive, Suite 220

Houston, Texas 77057 TEL: (713) 574-9044

"The name and address of the judgment creditor's attorney in Texas is:

Charles H. Peckham TBN: 15704900 Mary A. Martin

TBN: 00797280

Peckham Martin, PLLC 800 Bering Drive, Suite 220

Houston, Texas 77057 TEL: (713) 574-9044

"The purpose of the affidavit is so that notice of the filing of the foreign

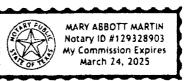
judgment can be given to the judgment debtor.

"Further Affiant sayeth Not."

Charles H. Peckham

SUBSCRIBED and SWORN TO BEFORE ME on this the 26th day of July 2024 to certify which witness my hand.

Notary Public in and for the State of Texas



UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAFAYETTE DIVISION

AGAPE BROADCASTERS, INC.

CASE NO.: 6:19-cv-01099 LEAD

VERSUS

JUDGE ROBERT R. SUMMERHAYS

SAMPSON, et al

MAGISTRATE JUDGE WHITEHURST

JUDGMENT

Considering the Unopposed Motion for Summary Judgment filed by Plaintiff, AGAPE BROADCASTERS, INC.;

IT IS ORDERED that Plaintiff's Unopposed Motion for Summary Judgment be and is hereby granted; and

JUDGMENT hereby is rendered in favor of Plaintiff, AGAPE BROADCASTERS, INC., and against Defendant, VALLIE MATIX, DULY APPOINTED DEPENDENT ADMINISTRATRIX OF THE ESTATE OF MARCUS TODD SAMPSON, in the amount of \$6,023,642 together with legal interest thereon from date of judicial demand until paid, and for all costs of these proceedings.

Lafayette, Louisiana, this 15th day of August, 2023.

HONORABLE ROBERT R. SUMMERHAYS UNITED STATES DISTRICT COURT JUDGE

EXHIBIT DE LE STATE DE LE STAT

DANIEL J. MCCOY, CLERK
USDC. WESTERN DISTRICT OF LA

OATS 07 14 2 4

CIVIL PROCESS REQUEST

Envelope No. 90528583 By: Wanda Chambers ADING Filed: 8/5/2024 11:22 AM

	ARTY SERVED YOU MUST FU IRNISH TWO (2) COPIES OF TI	` /		
CASE NUMBER:	CUR	RENT COURT:		
TYPE OF INSTRUMENT TO BE SER	VED (See Reverse For Types):			
FILE DATE OF MOTION:				
SERVICE TO BE ISSUED ON (Pleas			g To Be Served) <u>;</u>
1. NAME:				
AGENT, (if applicable):				
TYPE OF SERVICE/PROCESS TO B	SE ISSUED (see reverse for specific	: type):		
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**** 2. NAME:				
ADDRESS:				
AGENT, (if applicable):				
TYPE OF SERVICE/PROCESS TO B	SE ISSUED (see reverse for specific	: type):		
SERVICE BY (check one): ATTORNEY PICK-UP		CONSTABLE		
`	ER - Authorized Person to Pi			Phone:
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ATTORNEY (OR ATTORNEY'S AGE	ENT) REQUESTING SERVICE	:		
NAME:	· -		NO	
MAILING ADDRESS:				
PHONE NUMBER:area code	phone number		area code	fax number
EMAIL ADDRESS:				

SERVICE REQUESTS WHICH CANNOT BE PROCESSED BY THIS OFFICE WILL BE HELD FOR 30 DAYS PRIOR TO CANCELLATION. FEES WILL BE REFUNDED ONLY UPON REQUEST, OR AT THE DISPOSITION OF THE CASE. SERVICE REQUESTS MAY BE REINSTATED UPON APPROPRIATE ACTION BY THE PARTIES.

<u>INSTRUMENTS TO BE SERVED:</u>	PROCESS TYPES:
(Fill In Instrument Sequence Number, i.e. 1st, 2nd, etc.)	
	NON WRIT:
ORIGINAL PETITION	CITATION
AMENDED PETITION	ALIAS CITATION
SUPPLEMENTAL PETITION	PLURIES CITATION
	SECRETARY OF STATE CITATION
	COMMISSIONER OF INSURANCE
COUNTERCLAIM	HIGHWAY COMMISSIONER
AMENDED COUNTERCLAIM	CITATION BY PUBLICATION
SUPPLEMENTAL COUNTERCLAIM	NOTICE
	SHORT FORM NOTICE
CROSS-ACTION:	
AMENDED CROSS-ACTION	PRECEPT (SHOW CAUSE)
SUPPLEMENTAL CROSS-ACTION	©RULE 106 SERVICE
	
THIRD-PARTY PETITION:	SUBPOENA
SUPPLEMENTAL THIRD-PARTY PETITION	WRITS:
	ATTACHMENT (PROPERTY)
INTERVENTION:	ATACHMENT (WITNESS)
AMENDED INTERVENTION	ATTACHMENT (PERSON)
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	GARNISHMENT BEFORE JUDGMENT
INJUNCTION	GARNISHMENT AFTER JUDGMENT
MOTION TO MODIFY	HABEAS CORPUS
SHOW CAUSE ORDER	INJUNCTION
TEMPORARY RESTRAINING ORDER	TEMPORARY RESTRAINING ORDER
	PROTECTIVE ORDER (FAMILY CODE)
	PROTECTIVE ORDER (CIVIL CODE)
BILL OF DISCOVERY:	
ORDER TO:	POSSESSION (PERSON)
(specify)	POSSESSION (PROPERTY)
MOTION TO:	
(specify)	
• • • • • • • • • • • • • • • • • • • •	SCIRE FACIAS
	SEQUESTRATION
	SUPERSEDEAS

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Charles Peckham on behalf of Charles Peckham

Bar No. 15704900

cpeckham@pmlaw-us.com Envelope ID: 90528583

Filing Code Description: Request

Filing Description: Civil Process Request Status as of 8/5/2024 11:55 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Mary A.Martin		mmartin@pmlaw-us.com	8/5/2024 11:22:35 AM	SENT
Polly Lewis	12302250	plewis@lewis-lawyers.com	8/5/2024 11:22:35 AM	SENT
Houston Middleton		hmiddleton@lundylawllp.com	8/5/2024 11:22:35 AM	SENT
Hunter Lundy		hlundy@lundylawllp.com	8/5/2024 11:22:35 AM	SENT
Drew Lewis	24133131	dlewis@lewis-lawyers.com	8/5/2024 11:22:35 AM	SENT
Andrew Lewis	24068006	alewis@lewis-lawyers.com	8/5/2024 11:22:35 AM	ERROR